

# STATEMENT OF OPERATIONS OF PEMBROKE TELEPHONE COOPERATIVE TO ENSURE PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION

Pembroke Telephone Cooperative, a telecommunications carrier, has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunications carriers, equipment manufacturers, and customers, including telecommunications carriers reselling telecommunications services provided by a telecommunications carrier.

Operating procedures have been implemented by Pembroke Telephone Cooperative to ensure compliance with the Federal Communications Commission's Rules Section 64.2001 - 64.2009 (e) rules are as follows:

1. All disclosures or uses of Customer Proprietary Network Information (CPNI) are to be approved and accepted by the customer. (Customer applications have been drafted for customer's authorization.)
2. Personnel will be trained as to when they are and are not authorized to use CPNI and a disciplinary plan developed. Through its employee training the company ensures that all employees are aware of the privacy of communications requirements incumbent on them. Employees are only able to access records required in the performance of the assigned duties only.
3. A record will be maintained of any marketing campaigns that use the customer's CPNI. A record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will contain a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign. All records will be maintained for a minimum of one year.
4. All outbound marketing situations and maintaining of compliance records will be under the supervision of the general manager. Employees engaged in marketing and sales activities are only allowed to use CPNI as it relates to customer services currently provided by the company to the customer.
5. Disclosures of CPNI for valid law enforcement requests will be listed in a CPNI file with valid backup documentations. The file will give a

description of each request, the specific CPNI used in the request, and what services were rendered.

6. The general manager will sign a compliance certificate annually stating that he or she has personal knowledge that the company had been in compliance with the above operating procedures and that those procedures are adequate to ensure we are in compliance with Federal laws and requirements.

-1-

7. Written notice will be submitted within five business days to the commission of any instance where the opt-out mechanisms do not work properly. The notice shall be in a form of a letter and shall include the carrier's name, a description of the opt-out mechanism(s) used the problem(s), experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.
8. Pembroke Telephone Cooperative requires its vendors suppliers, and service bureaus to certify that CPNI of the company entrusted to them will not be disclosed in violation of the FCC Rules.

---

Date

---

Lisa W. Epperley, General Manager

